

From: [BAYUK Dana](#)
To: ["Courtney Savoie"](#)
Cc: [Jen Mott](#); [HAFLEY Dan](#); [LARSEN Henning](#); [PETERSON Jenn L](#); [POULSEN Mike](#); [Bruce K Marvin](#); [Cindy Bartlett](#); [Vipul Srivastava](#); [Sheldrake, Sean](#); [DeMaria, Eva](#); [Scott Coffey](#); [Lance Peterson](#); [Bob Wyatt](#); [Patty Dost](#); [Sarah Riddle](#); [Carl Stivers](#); [John Edwards](#); [Mike Gefell](#); [Ben Hung](#); [Matt Wilson](#); [Todd Thornburg](#); [John Renda](#); [Ben Johnson](#); [Halah Voges](#); [Rob Ede](#); [James Peale](#); [Mike Murray](#); [Myron Burr](#); [Sarah Currin-Moles](#); [imunk \(imunk@foleymansfield.com\)](#); [David Rabbino \(David.Rabbino@jordanramis.com\)](#); ["Chris.Reive@jordanramis.com"](#); [JOHNSON Keith](#); [paul.seidel@state.or.us](#)
Subject: RE: Siltronic comments regarding DNAPL Monitoring Summary Report - 2016
Date: Tuesday, August 08, 2017 8:53:27 AM

Good morning Courtney.

DEQ received Siltronic's June 19, 2017 letter commenting on the April 7, 2017 "DNAPL Monitoring Report – 2016" (2016 Report) that Anchor QEA, LLC prepared for NW Natural. Siltronic did not contact DEQ to discuss the 2016 Report prior to preparing the June 19th letter. Many of the comments in the letter could have been resolved over the phone. DEQ reiterates our previous requests that Siltronic contact us to discuss questions and/or comments before preparing comments letters. This is a more efficient approach to project communications given our workloads.

DEQ's review of the 2016 Report is ongoing. DEQ will consider Siltronic's June 17th comments as part of our review. DEQ is providing the comments below to clarify information in the letter and avoid misunderstandings going forward. Siltronic should be advised that absence of additional comments or clarifications regarding the letter should not be taken as our concurrence.

- Siltronic indicates that Section 2.1 of the 2016 Report, *"...omits evaluation of many of the wells on the Siltronic property that are monitored by MFA on behalf of Siltronic, which also contain observable DNAPL."* The letter goes on to present information on DNAPL occurrence at other locations in the northern portion of the Siltronic property. To prevent miscommunications going forward, the HC&C system DNAPL monitoring program was not intended to evaluate all installations where DNAPL is known to occur on the Siltronic or Gasco sites. The purpose of the monitoring program is to assess the potential for the HC&C system to influence DNAPL migration using multiple lines of evidence, such as TarGOST® logging, DNAPL thickness measurements, and DNAPL accumulation/removal rates. Given the purpose of the program, DNAPL monitoring focuses on a subset of installations where the presence of DNAPL is documented near HC&C system installations. The DNAPL monitoring program approved by DEQ is laid-out in the HC&C system Test Plan (see Footnote #1). Additional information is included in the Construction Design Report (see Footnote #2). Siltronic received draft and final versions of these documents along with DEQ.
- Siltronic also indicates in Section 2.1 that, *"The design, location, and construction of WS-14-161 were directed and approved by DEQ."* For clarification, DEQ reviewed and approved work plans in which Siltronic presented approaches to drilling and installing monitoring wells. Actual construction of monitoring wells was completed in the field under the supervision of a registered professional geologist working on behalf of Siltronic.

Please feel free to contact me with questions regarding this e-mail.

Dana

Mr. Dana Bayuk
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Footnote #1. Anchor QEA, LLC, 2013, "Final Groundwater Source Control Extraction System Test Plan, NW Natural Gasco Site," November (received November 13, 2013), a document prepared on behalf of NW Natural.

Footnote #2. Anchor QEA, LLC, 2012, "Revised Groundwater Source Control Construction Design Report, NW Natural Gasco Site," January (received January 31, 2012), a document prepared on behalf of NW Natural.

From: Courtney Savoie [mailto:csavoie@maulfoster.com]

Sent: Monday, June 19, 2017 3:57 PM

To: BAYUK Dana

Cc: Jen Mott; HAFLEY Dan; LARSEN Henning; PETERSON Jenn L; POULSEN Mike; Bruce K Marvin; Cindy Bartlett; Vipul Srivastava; Sean Sheldrake; Eva DeMaria; Scott Coffey; Lance Peterson; Bob Wyatt; Patty Dost; Sarah Riddle; Carl Stivers; John Edwards; Mike Gefell; Ben Hung; Matt Wilson; Todd Thornburg; John Renda; Ben Johnson; Halah Voges; Rob Ede; James Peale; Mike Murray; Myron Burr; Sarah Currin-Moles; imunk (imunk@foleymansfield.com); David Rabbino (David.Rabbino@jordanramis.com); 'Chris.Reive@jordanramis.com'; JOHNSON Keith; paul.seidel@state.or.us

Subject: Siltronic comments regarding DNAPL Monitoring Summary Report - 2016

Hello Dana,

On behalf of Siltronic, attached please find comments on NW Natural's DNAPL Monitoring Summary Report – 2016. We request that DEQ consider these comments during your review of the report.

Thank you,

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